

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

In the Matter of the Commission,     ) Application No. C-3049  
on its own motion, to conduct an     )  
investigation into possible            )  
solutions for extending the life       )  
of area codes 308 and 402.            ) November 18, 2004

**COMMISSION STAFF'S FIRST SET OF DATA REQUESTS TO CERTAIN  
CARRIERS**

The Commission staff hereby submits its First Set of Data Requests to the following carriers in the above-captioned proceeding:

Great Plains Communications, Inc.; Clarks Telecommunications Co.; Consolidated Telephone Co./Consolidated Telephone; Hamilton Telephone Company; Hartington Telecommunications Co.; Hershey Co-Op Telephone Company; K&M Telephone Company, Inc.; Nebraska Central Telephone Company; Northeast Nebraska Telephone Company; Sometown Telephone Company; Stanton Telecom, Inc.; Three River Telco; Eastern Nebraska Telephone Company; Rock County Telephone Company; Hemingford Cooperative Telephone; Arapahoe Telephone Company; Benkelman Telephone Company, Inc.; Cozad Telephone Company; Curtis Telephone Company; Diller Telephone Company; Glenwood Telephone Membership Corporation; Hartman Telephone Company; Keystone-Arthur Telephone Company; Mainstay Communications, f/k/a Henderson Cooperative; Plainview Telephone Company; Southeast Nebraska Telephone Company; Wauneta Telephone Company; Pierce Telephone Company; Hooper Telephone d/b/a Westel; Dalton Telephone Company, Inc.; Elsie Communications, Inc.; Cambridge Telephone Company; and Citizens Telecommunications Co.

**I. DEFINITIONS AND INSTRUCTIONS**

1. The terms "Carrier", "Carriers", "you", "your", or "yours" refer to each carrier above, its parents, subsidiaries, and affiliates, its former and present officers, directors, employees, representatives, agents, and attorneys and any other person acting on its behalf for any purpose responding to these data requests.
2. The terms "list", "describe", "detail", "explain", "identify", "specify", or "state", mean to set forth fully, in detail, and unambiguously each and every fact of which you have knowledge which is relevant to the answer called for by the data request.
3. The terms "related to" or "relating to" mean referring to, concerning, responding to, containing, regarding,

discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

4. The term "including" means "including, but not limited to."
5. The term "carrier" means any provider of telecommunications services.
6. Each data request is continuing in nature. Thus, if you acquire additional information with respect to data after any data request has been initially answered, you are required to supplement its response following the receipt of such additional information, giving the additional information to the same extent as originally requested. If you are unwilling to supplement any response, so state.
7. Commission staff is recommending that a protection order be entered and to protect any confidential/proprietary information responsive to these requests. Should the Commission enter such a protective order, copies will be sent to all carriers asked to respond to these data requests. In the event that any information requested herein is confidential/proprietary, you should identify any such information and file it with the Commission pursuant to the protection order. Should any information be privileged, you should identify any such information and any supporting documents in its written response, by date, and provide a general description of its content. You should also identify all persons who participated in the preparation of the document and all persons inside and outside the responding party, who received a copy, read or examined any such document. In addition, you should describe, with particularity, the grounds upon which privilege is claimed.
8. All responses shall be provided be provided in a MS Excel format with one hard copy submitted and one electronic copy submitted either in disk/CD format with the response or sent via email to [amelton@mail.state.ne.us](mailto:amelton@mail.state.ne.us) and [jraffety@mail.state.ne.us](mailto:jraffety@mail.state.ne.us).
9. The Commission recognizes that some of the data requests below require the submission of information that may have been previously provided in comments in this docket in response to the Commission's November 13, 2003 order. However, the Commission would request that you again provide the information so that it can ensure that the information is up to date and complete.

10. Pursuant to Neb. Admin. Code Title 291 § § 016.01, 016.11, and Rule 33 and 34 of the Nebraska Discovery Rules, **your responses are due within (30) days of service** of these data requests.

## **II. DATA REQUESTS**

**DATA REQUEST NO. 1:** For each of your switches in both the 308 and 402 area codes, please identify the following information:

- a) NPA-NXX
- b) Rate Center Name
- c) CLLI Code for the Switch
- d) Switch Manufacturer
- e) Switch Model
- f) Switch Software Version
- g) Whether the switch is capable of Local Number Portability
- h) Whether the switch is Thousands-Block Number Pooling capable

**DATA REQUEST NO. 2:** For any of the switches identified in Data Request No. 1 as **NOT** thousands-block number pooling capable, please identify the following information:

- a) All costs related to any hardware or software upgrades necessary to render each switch Thousands-Block Number Pooling capable;
- b) All costs related to implementation of any necessary upgrades identified above including but not limited to changes to carrier procedures, changes to carrier processes; changes to translation tables; necessary data base modification; consulting costs; and any other necessary costs.

**DATA REQUEST NO. 3:** Identify costs outlined in response to Data Request No. 2 that are duplicative of, would be incurred or have been incurred in rendering the switch capable of Local Number Portability.

**DATA REQUEST NO. 4:** For any of the switches identified in Data Request Nos. 1 and 2 as **NOT** thousands-block number pooling

capable, please identify the estimated time necessary to implement thousands-block number pooling.

DATED: November 18, 2004

Respectfully Submitted,

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Angela DuVall Melton #21755  
Nebraska Public Service Commission  
300 The Atrium; 1200 N Street  
Lincoln, Nebraska 68508  
(402)471-3101

CERTIFICATE OF SERVICE

On this 18th day of November, 2004, the above and foregoing document was served upon the following parties via U.S. Mail, postage prepaid:

Paul M. Schudel  
James A. Overcash  
Woods & Aitken, LLP  
301 South 13<sup>th</sup> Street, Suite 500  
Lincoln, NE 68508

On behalf of Great Plains  
Communications, Inc.; Clarks  
Telecommunications Co.;  
Consolidated Telephone  
Co./Consolidated Telephone;  
Hamilton Telephone Company;  
Hartington Telecommunications  
Co.; Hershey Co-Op Telephone  
Company; K&M Telephone Company,  
Inc.; Nebraska Central  
Telephone Company; Northeast  
Nebraska Telephone Company;  
Pierce Telephone Company;  
Dalton Telephone Company, Inc.;  
and Elsie Communications, Inc.

Timothy F. Clare  
Rembolt, Ludtke & Berger  
1201 Lincoln Mall, Suite 102  
Lincoln, NE 68508

On behalf of Stanton Telecom,  
Inc.; Three River Telco;  
Eastern Nebraska Telephone  
Company; Rock County Telephone  
Company; Hemingford Cooperative  
Telephone; Arapahoe Telephone  
Company; Benkelman Telephone  
Company, Inc.; Cozad Telephone  
Company; Curtis Telephone  
Company; Diller Telephone  
Company; Glenwood Telephone  
Membership Corporation; Hartman

Telephone Company; Keystone-  
Arthur Telephone Company;  
Mainstay Communications, f/k/a  
Henderson Cooperative;  
Plainview Telephone Company;  
Southeast Nebraska Telephone  
Company; Wauneta Telephone  
Company; and Cambridge  
Telephone Company

Sodtown Telephone Company  
Dan Muhlbach  
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Shelton, NE 68876

Hooper Telephone d/b/a Westel  
Jim Sherburne  
Westel Systems (Hooper  
Telephone)  
P.O. Box 330  
Remsen, IA 50150-0330

Citizens Telecommunications Co.  
Patricia Casurella  
14450 Burnhaven Drive  
Burnsville, MN 55306

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Angela Duvall Melton

**CERTIFICATE OF SERVICE**

I hereby certify that on November 18, 2004, a true and complete copy of the foregoing COMMISSION STAFF'S FIRST SET OF DATA REQUESTS was served on the following by first-class mail, postage prepaid:

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Angela DuVall Melton